IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

SCOTT JOHANNESSEN and MERIDIAN)	
VENTURE PARTNERS LLC,)	
)	
Plaintiffs,)	
)	
vs.)	CIVIL ACTION FILE NO
)	
BAC HOME LOANS SERVICING LP,)	3:13-CV-296
BANK OF AMERICA, N.A.,)	
and QUALITY LOAN SERVICE)	Judge Haynes
CORPORATION,)	Magistrate Judge Griffin
)	
Defendants.)	

<u>DEFENDANT QUALITY LOAN SERVICE CORPORATION'S</u> <u>MOTION TO DISMISS COMPLAINT</u>

COMES NOW Defendant Quality Loan Service Corporation, while preserving and not waiving any defenses under FRCP 12(b), including without limitation all improper venue, insufficiency of process, and insufficiency of service of process defenses, and files this its Motion to Dismiss Complaint pursuant to FRCP 12(b)(6). A memorandum in support of this Motion is annexed hereto.

This 27th day of June, 2013.

MCCURDY & CANDLER, L.L.C.

By: /s/Frank R. Olson TN BPR # 23999

Attorneys for Defendant Quality Loan Service

Corporation

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being is being served via the Court's ECF system on this the 27 day of June, 2013, upon:

Scott D. Johannessen 3200 West End Avenue Suite 500 Nashville, TN 37203

H. Frederick Humbracht
Bradley Arant Boult Cummings
Roundabout Plaza
1600 Division Street
Suite 700
Nashville, TN 37203

This 27 day of June, 2013.

/s/Frank R. Olson
TN BPR # 23999
Attorneys for Defendant Quality Loan Service
Corporation

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